ID: CCA-930439-08 Number: **200950041**

Office: Release Date: 12/11/2009

UILC: 6404.06-09, 7502.00-00

From:

Sent: Mon 10/6/2008 3:17 PM

To: Cc:

Subject: FW: 6404(g) and 7502

This office believes it would be inconsistent to treat the return as filed on Oct. 15th for purposes of IRC 7502 but treat the same return as filed on Oct. 22nd for purposes of IRC 6404(g).

Please let me

know if you would like to discuss this further.

Thanks,